

Attorney or Party Name, Address, Telephone & Numbers, and California State Bar Number BRAD D. KRASNOFF, ESQ. - State Bar #125065 SCOTT LEE, ESQ. - State Bar #204564 Lewis, D'Amato, Brisbois & Bisgaard LLP 221 N. Figueroa St., 12th Floor Los Angeles, CA 90012 Tel: 213/250-1800 Fax: 213/250-7900	FOR C T USE ONLY <div style="text-align: right; font-size: 2em; font-weight: bold;">COPY</div>
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA	
In re: PACIFIC VANGUARD SERVICE CORP. <div style="text-align: right;">Debtor(s).</div>	CASE NO.: LA 00-29027-SB <div style="text-align: right;"> APR 27 PM 4:47 FILED </div>

NOTICE OF SALE OF ESTATE PROPERTY

Sale Date: June 5, 2001	Time: 11:00 a.m.
Location: 255 E. Temple St., Los Angeles, California, Courtroom 1575	

Type of Sale: ☐ Public ☒ Private Last date to file objections: May 22, 2001

Description of Property to be Sold: Estate's right, title & interest in the state court action styled Jeong Hwa Lee, Dale M. Fiola v. Stewart Park, Linda Tran. et al. (Case No. VC033424), as well as all other cause or causes of action in law or equity which the estate could bring against the parties named in the above-referenced state action and against Park America Corp., VSACO Corp. & other related entitles that Stewart Park and/or Linda Tran may own.

Terms and Conditions of Sale: See attachment

Proposed Sale Price: See attached Terms & Conditions

Overbid Procedure (If Any): N/A

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

Contact Person for Potential Bidders (include name, address, telephone, fax and/or e-mail address):

Scott Lee, Esq.
Lewis, D'Amato, Brisbois & Bisgaard LLP
221 N. Figueroa St., 12th Floor
Los Angeles, CA 90012
213/250-1800 fax: 213/250-7900

Date: April 25, 2001

ATTACHMENT TO NOTICE OF SALE OF ESTATE PROPERTY:

Terms and Conditions of Sale

(a) Fiola shall advance any and all costs related to the prosecution of the Assets.

(b) Fiola shall receive a thirty-three and one third percent (33 1/3%) of the total recovery arising from and/or related to the Assets as his attorney's fees and shall be reimbursed for his reasonable actual costs incurred related to the same. "Recovery" referenced herein shall include any monies or other consideration obtained from the Defendants, their surety, or any other party, whether by judgment, settlement, levy or otherwise. "Recovery" referenced herein shall also include any monies obtained as an award of attorney's fees, costs, or damages of any kind obtained from the Defendants, their surety, or any other party.

(c) The amount of the recovery remaining after the payment of Fiola's attorney's fees (33 1/3 % of the total recovery) and his reasonable actual costs incurred, shall be divided evenly among the estate (50%) and Fiola and Lee (50%).

(d) Fiola and Lee shall retain their claim against the estate in the aggregate amount of \$128,230.18, but the claim shall be amended as a general unsecured claim for the same amount. Whatever Fiola and/or Lee receive pursuant to Subparagraphs 4(b) and (c) herein, it shall not reduce their entitlement to participate in any distribution from the 50% received by the estate on their claim of \$128,230.18.

(e) The Trustee and the estate shall bear no responsibility or obligation to pay any attorney's fees or costs incurred by Fiola and/or Lee. As such, in the event that Fiola and/or Lee are not successful in their prosecution of the Assets, neither the Trustee nor the estate shall be responsible for the payment of any attorney's fees or costs incurred by Fiola and/or Lee.